

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

PRC ACQUISITION, LLC,

Bankruptcy No. 19-23923-GLT

Debtor,

Chapter 11

PRC ACQUISITION, LLC,

Doc. No.

Movant,

Related to Doc. Nos. 1 & 16

vs.

NO RESPONDENT.

**SECOND MOTION FOR ENLARGEMENT OF TIME TO
FILE SUBMISSIONS TO COMPLETE DEFICIENT FILING**

AND NOW, comes PRC Acquisition, LLC, the Debtor in the above Chapter 11 Case, by and through its Counsel, Robert O Lampl, John P. Lacher, David L. Fuchs, Ryan J. Cooney and Sy O. Lampl and files this **SECOND MOTION FOR ENLARGEMENT OF TIME TO FILE SUBMISSIONS TO COMPLETE DEFICIENT FILING** as follows:

1. The Movant is PRC Acquisition, LLC, the Debtor in the above Chapter 11 Case.
2. The Movant commenced the above Chapter 11 Case by filing a Petition for Relief with the Clerk of this Honorable Court on October 7, 2019.
3. At the time of the filing of the Petition for Relief, the Movant did not have available and did not provide various items of information and documents which needed to be provided by the Movant to complete its Petition. The original deadline by which

the Movant is to submit the items necessary for the completion of the Petition was October 21, 2019.

4. The Movant filed a Motion to Extend Time to Complete Deficient filing, which Motion was granted by Order of Court dated October 22, 2019.

5. Per the October 22, 2019 Order, the Movant's completed Petition is now due on November 4, 2019.

6. The Debtor's primary asset is a 168,000 square foot building in Monroeville, PA, which has been known as the "Monroeville Raquet Club" and the "Club Sport & Health," located at 1 Racquet Lane, Monroeville, PA 15146 (hereinafter the "Raquetclub").

7. For years, the Raquetclub housed both a membership based health club and an athletic facility consisting of indoor fields that were available for lease to various youth and adult sports teams.

8. The Raquetclub and its businesses have not been operational since August of 2018. Accordingly, all the employees and managers have since moved on.

9. The members for PRC Acquisition, LLC ("PRC") consist of Yakub Mahomed and Ingrid Levendale who reside in Zimbabwe. They have owned PRC in some capacity since 2005 and have always relied upon various managers to tend the Raquetclub and its operations.

10. Upon the filing of the within bankruptcy, the undersigned informed Mr. Mahomed of the requirement to file completed bankruptcy schedules and what information was required to complete the bankruptcy schedules.

11. Unfortunately, the majority of the relevant records are still contained within the Raquetclub.

12. Thus, since the filing, Mr. Mahomed has been actively trying to identify someone to gather the relevant records from the Raquetclub, to review said records and to assist the undersigned in completing the bankruptcy schedules.

13. Recently, Mr. Mahomed communicated with Colleen Keough, the last manager employed by PRC prior to the closure of the Raquetclub, about compiling the information and records required to complete the bankruptcy schedules. Ms. Keough has agreed to help.

14. The undersigned communicated directly with Ms. Keough on November 1, 2019 to confirm said agreement and to explain to her what information and documents would be required. Given that Ms. Keough was the last manager of the Raquetclub, the undersigned believes that she is the most appropriate person for this task.

15. However, given that Ms. Keough has only recently agreed to assist, the Debtor requires and respectfully requests an additional enlargement of time to gather the materials necessary for completion of the Petition.

16. No party will be prejudiced if the enlargement of time being requested herein is granted.

Wherefore, it is respectfully requested that this Honorable Court enter an Order enlarging the time in which the Debtor may cure the deficiencies in its Petition by an additional period of twenty-one (21) days, until November 25, 2019.

Respectfully Submitted,

Date: November 1, 2019

/s/ Robert O Lampl
ROBERT O LAMPL
PA I.D. 19809
JOHN P. LACHER
PA I.D. #62297
DAVID L. FUCHS
PA I.D. #205694
RYAN J. COONEY
PA I.D. #319213
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CERTIFICATE OF SERVICE

Robert O Lampl, John P. Lacher, David L. Fuchs, Ryan J. Cooney and Sy O. Lampl hereby certify, that on the 1st day of November, 2019, a true and correct copy of the foregoing **SECOND MOTION FOR ENLARGEMENT OF TIME TO FILE SUBMISSIONS TO COMPLETE DEFICIENT FILING** was served upon the following
(via electronic service):

Norma Hildenbrand
Office of the United states Trustee
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

Date: November 1, 2019

/s/ Robert O Lampl
ROBERT O LAMPL
PA I.D. 19809
JOHN P. LACHER
PA I.D. #62297
DAVID L. FUCHS
PA I.D. #205694
RYAN J. COONEY
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